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ABSTRACT

This guide discusses the basic requirements for administering Federal Work-Study (FWS) America Reads Challenge programs and outlines specific requirements related to FWS-funded community service positions. These programs offer colleges and universities an opportunity to help improve the reading skills of preschool school and elementary school students by linking the college students with children. This guide describes some of the programs currently being utilized on campuses and suggests ways colleges can include their students in tutoring and mentoring activities through FWS. Sections in the report are: section 1, "Why Your Campus Wide Benefit from Community Service"; section 2, "Why Your Campus Will Benefit from Reading Tutors"; section 3, "The Federal Work-Study Program: What Is Required"; section 4, "How To Make Community Service a Part of the Federal Work-Study Program"; section 5, "Implementing a Community Service Program"; section 6, "Marketing Community Service to Students"; section 7, "Conclusion"; and section 8, "Red Flags for Federal Work-Study Community Service Projects." The appendices, which make up section 9, include descriptions of the community and tutorial services offered by 20 colleges, sample documents, information resources, audit findings, Job Location and Development Program questions and answers, and a list of state commissions for national and community service. (JLS)

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EXPANDING FEDERAL WORK-STUDY AND COMMUNITY SERVICE OPPORTUNITIES

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An EWS Resource Guide from the U.S. Department of Education

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The America Reads Challenge Federal Work-Study program is a strong example of how students both give to and receive from the community. The program promotes access to college by helping students finance postsecondary education costs while offering these same students the opportunity to pursue community service. I believe this creates a win-win situation because young learners and communities gain from the services provided, and students who might not ordinarily be able to share in the community service experience can now afford to be involved.

Richard W. Riley
Secretary
U.S. Department of Education

EXPANDING FEDERAL WORK-STUDY AND COMMUNITY SERVICE OPPORTUNITIES

May 1997

AN FWS RESOURCE GUIDE

U.S. Department of Education

UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF POSTSECONDARY EDUCATION

Dear Colleague:

This Resource Guide originated from a focus group that we convened in November 1996 to discuss the challenges to the higher education and financial aid communities resulting from a significant increase in the appropriation for Federal Work-Study (FWS) and a challenge from President Clinton to use as much of the increase as possible on community service. In particular, the President's "America Reads Challenge" emphasizes reading tutors for preschool and elementary students as a critical national need for which the additional FWS resources available to you might help forge a solution.

Since that date in November of last year when one of your colleagues proposed this Resource Guide, we have worked diligently to gather material and information that responds to the questions we have heard from you. Thus, you will find in the Guide a discussion of the basic requirements for administering FWS as well as detailed information about specific requirements related to FWS-funded community service positions.

I encourage you to review one section of the Guide in particular: the "Best Practices" appendix. The community service and tutorial services described by the 20 colleges that submitted best practices illustrate very well the potential for using FWS resources to meet the needs of our communities and schools. As a former financial aid administrator, I take great pleasure in seeing how creatively and thoughtfully our colleagues have used FWS to fashion these meaningful educational and service programs for students.

We look forward to working together to expand community service opportunities even further.

Sincerely,

Elizabeth M. Hicks

Elizabeth M. Hicks
Deputy Assistant Secretary
Student Financial Assistance Programs

600 INDEPENDENCE AVE., S.W. WASHINGTON, D.C. 20202

Our mission is to ensure equal access to education and to promote educational excellence throughout the Nation.

UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF THE SECRETARY

Dear Colleague:

President Clinton's "Call to Action for American Education" set forth 12 priorities that will prepare America's students for the 21st century. One key element is ensuring that every child will read independently and on grade level by the time they leave the third grade. The ***America Reads Challenge*** offers colleges and universities participating in the Federal Work-Study Program the opportunity to help improve the reading performance of preschool and elementary school students by linking the energy and resources of student-participants with children eager and willing to learn.

I am pleased that this guide can be added to your resources as you involve Federal Work-Study students in ***America Reads*** and other important community service activities. The guide describes some of the innovative programs already being utilized at other campuses and offers new ways your students can become involved in tutoring and mentoring opportunities through Federal Work-Study resources.

The descriptions of community service projects in this guide are impressive. The extent of involvement and the success of the current efforts being used to mobilize resources in individual communities are models we can all follow. I applaud the pioneers whose programs are highlighted in this guide and am confident they will prepare the way for many other schools and communities to join in the ***America Reads Challenge***.

As administrators and educators, you understand the importance of programs that provide opportunities for students whose dreams of a college education and brighter future might not be realized without the Federal Work-Study Program. The ***America Reads Challenge*** gives these students the opportunity to open that door to another generation of children. We look forward to your participation in ***America Reads***.

Sincerely,

Carol H. Rasco

Carol H. Rasco
Senior Adviser to the Secretary
Director, America Reads Challenge

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About the Authors

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Ed McDermott is an associate director of financial aid at Georgetown University in Washington, D.C., where he directs the FWS and Job Location and Development Programs. He has been actively involved in establishing a collaborative reading tutor initiative to enable all of the local colleges and universities to train and assign their students to tutor at the city's public elementary schools.

Acknowledgments

The authors acknowledge the assistance provided them by the National Student Employment Association. Their time and effort in providing technical assistance and support added significantly to the quality of this publication. They also appreciate the comments and editing provided by the staff of the National Association of Student Financial Aid Administrators.

Finally, much credit must go to those financial aid and work-study administrators who were willing to provide profiles of their programs for this endeavor. They have provided a wealth of ideas and directions that other campuses can use to develop meaningful community service and tutoring programs for their FWS students.

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The purpose of this Federal Work-Study (FWS) resource guide is first to outline what the law requires campuses to do in the area of community service and then to offer easy how-to instructions to meet those mandates. Finally, a resource section at the end will provide examples of exemplary programs and a list of resources for campuses to use as they ready themselves to assume the challenges of community service.

I. WHY YOUR INSTITUTION WILL BENEFIT FROM COMMUNITY SERVICE

Benefits for the Institution

Creating community service jobs through the FWS Program allows institutions to play a leadership role in addressing the needs of their communities. Increasingly, nonprofit higher education institutions are being called upon by their local governments to pay taxes or to make a monetary contribution in lieu of taxes to pay for a portion of the cost of basic services provided by local governments. Some institutions have complied with these requests, but an ever-increasing number of schools point to the intangible contributions that the institution and its students make to the local community. Community service jobs allow institutions to focus efforts on specific problems identified by the community and to demonstrate their valuable contributions to the local community.

Benefits for the Students

An increasing number of college students desire to participate in activities outside the classroom, including volunteer activities in the local communities. Most students are confronted with time constraints that force them to limit their involvement to a select number of activities. This is especially true for students who need to work in order to pay for a portion of their education expenses. For many of them, the combination of classes, study time, and one or more part-time jobs severely limits their ability to participate in volunteer activities. FWS community service jobs provide these students with the option of combining the financial need to work with the personal goal of helping the local community. Moreover, community service through literacy tutoring or other activities can be an integral part of a student's academic experience.

In addition, students working in FWS community service jobs, such as literacy tutoring, are exposed to real-world problems and issues they can bring back to the classroom to enhance the connection between the academic environment and the outside world, and specifically the local community. These students also gain a deeper understanding for the local residents that they meet and work with as part of their FWS community service jobs.

Benefits for the Community

Many communities across the nation are facing serious reductions in funding for services provided to needy citizens, the environment, and children. They are forced to turn to non-governmental organizations to assume the services formerly provided by federal, state, and local governments. For those communities and their nonprofit organizations, a ready source of workers at low or no cost is a significant benefit.

Communities very often do not understand the many resources higher education institutions have that could be of value to the community. From facilities that could be used for community meetings to a supply of experts in a wide range of areas, campus resources can prove to be an invaluable source of assistance for communities. Working with campuses to structure community service programs or tutoring programs can be the beginning of many opportunities for local areas.

For rural areas and inner cities that have declining resources for their public schools, a free source of tutors for children could make a dramatic difference in the quality of education that children receive. FWS tutors can provide the individual instruction for children that might otherwise be lacking and that can make the difference between success and failure.

II. WHY YOUR INSTITUTION WILL BENEFIT FROM READING TUTORS

Better Community Relationships

The ***America Reads Challenge*** offers a unique opportunity for colleges to join with others across the nation in improving the future of our country. The late Ernest Boyer, who served as U.S. Commissioner of Education in the 1960s and later headed the Carnegie Foundation, frequently lamented in his later years the failure of academe to take an active role in the greater community that surrounds it. He urged his colleagues on the campuses to dedicate themselves and their resources to improving the world around them. He warned that isolation from the community would lead to a loss of respect for the academic world. Developing a corps of FWS tutors is clearly a step in reestablishing the leadership role of the campus in the community.

In addition to being the right thing to do, working with community schools to help them fulfill their missions will also lead to a more cohesive education system. The students who are being tutored in elementary schools today will be the college students of tomorrow.

III. THE FEDERAL WORK-STUDY PROGRAM: WHAT IS REQUIRED

Effective July 1, 1994, institutions of higher education were required to use at least five percent of their FWS funds for community service. While establishing a commitment to community service jobs seems daunting, there are some tried and true methods that enable nearly every campus to comply and to begin reaping the benefits of community service activities. The first step is a thorough understanding of what is required by law. The following guidelines will explain what must be done to meet the federal requirements.

Five Percent for Community Service

To meet the requirements of the federal law and regulations, institutions must spend at least five percent of FWS dollars received from the federal government to compensate students employed in community service jobs.

- The five percent amount is based upon the FWS allocation received from the federal government, before funds are transferred to the Federal Supplemental Educational

Opportunity Grant Program, or transferred to either the school's administrative cost allowance or the Job Location and Development Program.

- Because the five percent is based upon the FWS amount received for each award year, it is not affected by funds carried forward to the next year or carried back to the previous year.
- The five percent requirement is related only to the federal share of student wages and is not affected if the institution decides to exceed its required 25 percent share of student wages.
- If an institution uses 10 percent or more of its FWS allocation for community service jobs, it is eligible to apply for reallocated funds. All reallocated FWS funds must be spent for community service wages.

Definition of Community Service

The statutory definition of "community service" is broad. It includes services that are identified by an institution of higher education through formal or informal consultation with local nonprofit, governmental, and community-based organizations, as designed to improve the quality of life for community residents, particularly low-income individuals, or to solve particular problems related to their needs. They include, among others:

- fields such as health care, child care, literacy training, education (including tutorial services), welfare, social services, transportation, housing and neighborhood improvement, public safety, crime prevention and control, recreation, rural development, and community improvement;
- support services to students with disabilities; and
- activities in which a student serves as a mentor for such purposes as tutoring, supporting educational and recreational activities, and counseling, including career counseling.

Initially, there was some misunderstanding about the acceptability of indirect community service positions. The U.S. Department of Education has clarified the issue as follows:

- Students may be employed in community service positions that provide either direct or indirect services to the community. For example, it is acceptable for an FWS student to be employed in a clerical position for a food bank. It is not required that the student be involved in delivering services directly. Support services are community service jobs that can be counted toward the five percent mandate.
- Both on-campus and off-campus jobs can qualify as community service work. However, on-campus jobs must involve a program, project, or service that is provided to the general public in the local community. On-campus jobs that serve only the campus community do not qualify as community service employment. All off-campus jobs, including community service jobs, require a contract which contains a description of the job and the conditions for employment.

Matching Dollar Requirements and Waivers

Each institution participating in the FWS Program is required to provide at least 25 percent of students' wages, with federal dollars providing up to 75 percent of the compensation. If a student is employed by an off-campus private for-profit employer, the required match that must be paid by that employer is at least 50 percent of the student's compensation. However, many institutions

choose to exceed those match requirements in order to provide more FWS jobs for their students. There is no restriction on establishing different match rates within a school's FWS Program.

The U.S. Secretary of Education is also given the flexibility to waive the matching requirement in cases where the goals of the FWS Program could be furthered if the match were waived. The Secretary has used that authority to waive the matching requirement for institutions designated as an eligible institution under the Strengthening Institutions Program, the Strengthening Historically Black Colleges and Universities Program, or the Strengthening Historically Black Graduate Institutions Program. These institutions often serve large numbers of disadvantaged students and have limited institutional resources. The waiver to the matching requirement does not apply to the 50 percent federal-share limitation for wages paid to students employed by private for-profit organizations or the 80 percent federal-share limitations for the administration of the JLD Program.

With the initiation of the ***America Reads Challenge*** and its goal of mobilizing 100,000 work-study tutors, the Secretary is providing for an additional waiver of the FWS matching requirement. Effective July 1, 1997, the new waiver allows 100 percent of the wages of a work-study tutor to be paid from federal dollars, if the student:

- is employed as a reading tutor for children who are in preschool through elementary school; and
- is employed by the institution itself, or by a federal, state, or local public agency, or by a private nonprofit organization.

There are several limitations on the waivers. They apply only to the payment of wages. Employers are still responsible for the employers' share of social security, worker's compensation, retirement, or any other welfare or insurance program that the employer must pay for an employee and fringe benefits. Waivers cannot be applied to private for-profit employers, even if the employer hires the student to provide literacy tutoring services.

Informing Students About Community Service Opportunities

Notifying students about community service employment opportunities is required by the law, but it is also a valuable public relations tool. Many institutions already have mechanisms to provide students with employment opportunity information, and incorporating community service jobs into the existing structure is the easiest way to proceed. Announcements about the availability of jobs must incorporate a separate section containing information about community service jobs.

Program Participation Agreements

Institutions are expected to encourage their FWS students to participate in community service opportunities. Specifically, the Program Participation Agreement (PPA) that governs the conditions of an institution's participation in FWS requires that all students be informed of the opportunity to perform community services and that the local nonprofit, governmental, and community-based organizations be consulted to identify those opportunities.

Working with the Community to Identify Eligible Off-Campus Employers

As indicated in the definition of FWS community service jobs, the institution must consult, formally or informally, with local nonprofit, governmental, and community-based organizations to identify community service employment opportunities. However, before that consultation begins, it is essential to know who qualifies as an off-campus employer.

Nonprofit organizations must demonstrate their nonprofit status, as defined by state or federal law. Examples of nonprofit organizations include:

- child care centers
- nonprofit schools
- nonprofit health centers
- nonprofit mental health facilities and halfway houses
- shelters
- nonprofit drug abuse centers
- higher education institutions
- conservation corps
- nonprofit camps

Public agencies are also eligible off-campus employers. These include municipal or county offices, state government agencies, and federal departments (other than the U.S. Department of Education).

It is equally important to know what jobs do not qualify as eligible off-campus employment. Although the following jobs may be in the nonprofit sector, they are not considered in the public interest, and FWS funds may not be used to pay students employed in them:

- Jobs that primarily benefit the members of an organization that has membership limits, such as a credit union, a fraternal or religious order, or a cooperative
- Jobs involving any partisan or nonpartisan political activity or association with a faction in an election for public or party office
- Jobs working for an elected official, unless the official is responsible for the regular administration of federal, state, or local government
- Jobs working as a political aide for any elected official
- Jobs that consider the student's political affiliation for hiring purposes
- Jobs that involve lobbying on the federal, state, or local level

Monitoring Earnings

Because FWS is a need-based award made to individual students, the amount of the FWS funds which each student actually earns must be monitored against his or her award. The responsibility for monitoring these earnings must be clearly delineated so that the FWS Program is not charged for more than the student is eligible to receive and the student does not exhaust his/her earnings limit before the award period is over. Earnings over and above the FWS limit may result in an overaward. (See 34 CFR 673.5 effective July 1, 1997.)

Periods of Non-Enrollment
A student may be employed under FWS during a period of non-enrollment, such as summer. To be eligible a student must be planning to enroll or re-enroll for the next regular academic session, as documented in the school's records. The student's earnings (minus taxes and job-related costs) must be considered a resource for the next period of enrollment.

IV. HOW TO MAKE COMMUNITY SERVICE A PART OF THE FEDERAL WORK-STUDY PROGRAM

A successful community service program must have three coordinated components:

- a commitment from the campus
- a commitment from the community; and
- the availability of students willing and able to participate in the programs.

Campus Commitment
The broader the support on the campus for community service jobs, the better the community service program will be. Community service goes beyond the confines of the student employment or financial aid offices. There needs to be support from as many sources as possible -- from college presidents to faculty members to students. With the national emphasis on tutoring, college presidents around the country are signing on to the ***America Reads Challenge*** by promising to dedicate FWS funds to tutoring jobs. If a campus cannot participate in the tutoring initiative, community service jobs can still be valuable in enhancing the institution's relationships with the community and in contributing to student learning.

The Higher Education Act of 1965, as amended, requires campuses to spend at least five percent of their FWS funds for community service jobs. However, once there is a concerted effort to provide community service opportunities, the institution should not stop just because the five percent requirement is reached. There are benefits to doing more. If the institution reaches ten percent, it is eligible for additional FWS funds when the Department of Education reallocates funds returned by other institutions. President Clinton has also called on campuses to pledge one-half of their FWS increases for FY 1997 to literacy training programs as part of the ***America Reads Challenge***. If the campus develops a reading tutoring program for children in grades pre-k through elementary, it does not have to pay the 25 percent match for those tutoring jobs.

Campus Inventory
As a part of building support on campus for community service programs, an assessment of what already exists will be essential. Answering the following checklist of questions will help with this process:

- Is the institution meeting or exceeding the five percent requirement?
- What volunteer and community service programs or offices already exist? What are the nature and scope of these activities, and is there any potential for FWS community service employment opportunities?

- Is the student volunteer council and/or student government involved in focused volunteer or community service projects? Does the Dean of Students office have suggestions about other student groups that are involved with community service?
- Is the public affairs office participating in community service projects?
- Does the president's office already support community service and tutoring activities?
- Are the institution's professional schools and academic departments, such as those dealing with the arts, environmental studies, humanities, law school, medical school, political science, sociology, education, and psychology, interested in becoming involved in community service?
- Are there formal service learning or experiential education programs on the campus?
- Will other local higher education institutions collaborate with you in developing community service and tutoring programs?

After completing the inventory, institutions will have a clearer idea of the opportunities that already exist, as well as those that need to be developed.

Student Inventory

A realistic evaluation of student resources is a key component to building a successful community service program. The ability of students to participate in community service jobs needs to be evaluated, and any barriers to such employment should be identified. The following checklist of questions will help the campus in evaluating student resources:

- How many hours can students work?
- What are the academic demands on students?
- What are their academic schedules like?
- What transportation is available to off-campus sites?
- What are the enrollment figures for academic programs that are most likely to have a strong interest in community service work?
- Are students eligible to earn more from FWS than they are currently?
- How would the institution's packaging of financial aid affect the ability of students to work in community service jobs?
- What is the age of the student body?
- In what extracurricular activities do students engage?
- What are student interests and skills?

Students can serve as a valuable resource for ideas on new community service options, as well as ways to make FWS jobs more attractive to students. Many students already have connections with community organizations and could research the help needed by those organizations. Institutions may gain student input by attending student group meetings or conducting student surveys.

Community Consultation

The next step is to inventory the community. Offices on campus that coordinate volunteer and public service activities for students are a good starting point for identifying community contacts. The best starting points off-campus are city, township, or borough officials.

Large urban areas usually have organizations that work specifically with community service providers. If that resource is not available, the local telephone directory can be used to identify community organizations such as the United Way, Urban Corps, community medical centers, volunteer action coalitions, low-income housing programs, public safety programs, and other public and private nonprofit agencies. Another vital contact is the AmeriCorps programs in the local area. The state Governor's office, the Corporation for National Service, or the U.S. Department of Education can provide a list of AmeriCorps projects in local areas, as well as lists of Head Start centers. A list of all State Commissions for National and Community Service is provided in Appendix 6. These Commissions can help match institutions with local service programs that are likely to be interested in using FWS students.

Local school districts must be contacted early in the process. The best place to begin is the local district superintendent's office to determine if there is an ongoing district-wide volunteer tutoring program. If there are no district programs, contact should be made with local school principals.

Local schools and nonprofit day care centers should be contacted so that they know that your institution is willing to work with them to provide tutoring for preschool and elementary school children. Many schools already have programs for tutors, which may be available for FWS students. Those programs very often include necessary training programs for would-be tutors. If the district does not have such a program, a discussion can help to determine what, if any, tutoring needs the schools have and how best to initiate a tutoring program to meet those needs.

Once the agencies available for off-campus employment have been identified, they should fill out a needs assessment form. A sample assessment is provided in Appendix 2. The assessment serves both as a tool to help place students and as a mechanism for avoiding potential misunderstandings in the future.

V. IMPLEMENTING A COMMUNITY SERVICE PROGRAM

Successful implementation of a community service program depends upon the soundness of the legal, contractual, and administrative components of the program, and the degree to which operational and logistical details have been worked out. Implementation requires a specific understanding of the requirements of the program as well as cooperation from various on- and off-campus entities. For many participating institutions, the five percent community service requirement necessitated the creation of an off-campus FWS Program. Others already had an eligible on-campus program in place. For institutions that were already conducting off-campus FWS Programs, the community service requirement may have resulted in changes to the contractual or administrative arrangements of the existing program to accommodate the needs of community service agencies and the goal of increased student participation.

Consultation with the Financial Affairs Office

Before expanding the community service program, there needs to be coordination with the campus' financial affairs office. It is essential that:

- They understand the requirement to spend at least five percent of the FWS allocation on community service jobs.
- They evaluate the impact on the campus of moving FWS jobs into off-campus community service positions, if necessary.
- They evaluate the potential benefit of not having to match funds for students employed as tutors versus the potential reduction in the number of students who can participate in the program.

The budget discussion should take place early in the process. It will be more difficult to deal with budget implications if the budget office is not prepared to shift resources, and the campus then finds it is facing a shortfall in student employees or resources.

Who Is the Employer?

The first question to be answered in establishing an off-campus FWS Program is, "Who is the employer?" There are two potential answers to that question.

- The institution can serve as the employer.
- The community service agency can serve as the employer.

The institution must enter into a written agreement, a contract, with any off-campus agency that employs FWS students. The agreement must state which organization, the institution or off -campus agency, will be the employer. The employer is generally considered to be the organization that will control the work of the FWS students, supervising them at the work site, regulating their hours of work, and generally ensuring that they perform their duties properly. See the Department of Education's recommended contract language for indicating the intent of the parties as to who is considered the employer in Appendix 2. There is no requirement that stipulates preference for one method or the other.

Liability and Risk Management

Resolution of "Who is the employer?" is part of the larger issue of risk management for the institution. Other related questions that must be addressed include:

- Who will pay the matching funds?
- Who will pay Social Security (when applicable)?
- Who will provide Worker's Compensation?
- Who will be responsible for payroll, time cards, and I-9 forms?
- Who will be responsible for training the students and their supervisors?
- Who will supervise the students?

Once the answers to these questions are determined, with the help of the institution's attorney, the responsibilities need to be clearly spelled out in the contract between the institution and the agency.

The risk management questions posed above involve responsibility for program management, appropriate use of FWS funds, and meeting other legal requirements. However, the broader issue of liability and risk management is crucial to protecting the institution in a variety of situations.

Most cases of legal liability involving students arise from negligence or from failure of the school to execute its duty appropriately to protect the student. Liability can result through harm or injury incurred by the student or through actions by the student, in the performance of his or her job, that cause injury to someone else. Liability could occur for placing a student in an unsafe situation or for failing to warn a student of potential dangers. Similarly, an institution could be liable if a student, while performing his or her FWS job, allowed someone else to be injured. For example, if a child, under the supervision of an FWS student working in an institution-run day care center, was injured because the student allowed the child to run into the street, the institution may be liable.

When an FWS community service student is employed off-campus, any injury may result in liability for both the institution and the employer. States have very different laws regarding such liability, and institutions must coordinate their community service programs with their offices of legal counsel to ensure they are aware of potential liabilities.

One of the greatest potential risk areas is transportation. Many institutions provide transportation for their students to off-campus employment, especially in FWS jobs such as tutoring. If an accident occurs, the institution could face significant liability. Campuses must understand the range of their liability and have adequate insurance protection to cover them. A large part of risk management is balancing the potential benefit of an activity against its potential liability.

Most institutions have risk management procedures in place for student-related activities, such as field trips, or for dealing with accidents that might occur. It is critical that these procedures are reviewed carefully because they also can serve as risk management strategies for FWS community service jobs. In addition, FWS community service programs should incorporate the following guidelines as a part of their risk management policies:

- FWS students and their supervisors must know what is expected of them. They should have a well-defined position description and operate within those confines.
- FWS students must know how to perform their duties properly and safely. They need to be well trained and appropriately equipped so that they have the knowledge and skills to do their jobs.
- FWS students and their supervisors need to know the procedures to follow for reporting emergencies, accidents, or problems and suggested changes. They need to be trained to recognize and respond to potential hazards.

Talk to the Attorneys

Establishing an off-campus FWS Program should involve the institution's attorneys. Legislation affecting employment has undergone some major revisions in the last few years because of such laws as the Americans with Disabilities Act (ADA) and regulations from the Occupational Safety and Health Administration (OSHA). Legal assistance will also be needed in evaluating how to manage potential risks to the institution and how to draft contracts with off-campus agencies.

Contracts

Contracts between the institution and the off-campus agency must clearly specify the role that each entity will perform and who will assume the legal responsibility for the questions listed above. An institution conducting an off-campus FWS Program should have a signed contract in its files before students begin working at an off-campus agency. The Department of Education's sample contract language and an example of a contract are provided in Appendix 2.

Establishing Payroll and Accounting Practices to Manage the Program

It is often necessary and certainly advisable to coordinate off-campus FWS Program procedures with the institution's payroll and accounting offices. If the institution is assuming payroll responsibility in the written agreement for the off-campus FWS Program, it should establish separate receivable accounts where the agencies' share of the students' salaries can be charged each time the payroll is run. The institution should use the information recorded in these accounts for billing and the reconciliation of payments that are received. If time reporting is ordinarily handled at the department level for on-campus jobs, the institution may need or want to create a separate department to report the hours worked for each student in the off-campus program. There also needs to be consultation with the accounting division to determine procedures for billing agencies and recording receipt of their payment for their share of student salaries.

If the agency is assuming payroll responsibility in the written off-campus agreement, the accounting department will need to develop procedures for:

- requesting reimbursement from the FWS account;
- collecting payroll information from off-campus agencies;
- recording and tracking the earnings of students working off-campus; and
- combining information on off-campus and on-campus work to complete the FISAP reporting requirements

The FWS section of the U.S. Department of Education's Fiscal Operations Report and Application to Participate (FISAP) asks for an accounting of dollars spent on community service, as well as dollars spent in on- and off-campus programs. A clear audit trail showing on-campus versus off-campus expenditures must be kept.

How Much Will It Cost?

The institution must by law spend at least five percent of its FWS allocation on community service. The following example shows how to calculate that amount and how to estimate the number of community service jobs that will be required to meet the mandate.

Calculation of the five percent community service requirement
for Sample University

- Sample U receives a $1,000,000 total FWS allocation
- 5 percent of the allocation is $50,000 (required for community service)
- Sample U considers that:
    - the average academic year FWS award is $1,000

- the average student earns $900 of their $1,000 FWS award
- the acceptance rate on FWS offers is 75%
  (number of students working divided by number offered FWS)
- the match rate is 75% federal, 25% institutional

Example for community service jobs

∘ FWS allocation	$1,000,000	
∘ 5% for community service	$ 50,000	(1,000,000 x .05)
∘ total earnings required at a 75-25 match	$ 66,667	(50,000 / .75)
∘ minimum # of students required if earning maximum award	67	(66,667 / 1,000)
∘ # of students required if earning average $900 award	74	(66,667 / 900)
∘ # of awards to offer using a 75% acceptance rate	99	(74 / .75)

Example for reading tutors with waiver of match

∘ FWS allocation	$1,000,000	
∘ 5% for community service	$ 50,000	(1,000,000 x .05)
∘ total earnings required at 100% federal dollars	$ 50,000	
∘ minimum # of students required if earning maximum award	50	(50,000 / 1,000)
∘ # of students required if earning average $900 award	56	(50,000 / 900)
∘ # of awards to offer using a 75% acceptance rate	75	(56 / .75)

Once the issue of how much FWS money an institution must spend at a minimum for community service is determined, the real question becomes how much does the institution want to spend? With all the opportunities available for community service, including new reading tutors, an institution does not need to limit itself to the minimum requirement. The institution must carefully monitor the community service expenditures to ensure compliance with the five percent or higher requirement.

There are several ways of making more funds available for community service jobs. The institution may want to consider exceeding the required 25 percent match for on- or off-campus jobs, or both. Increasing the match rate will spread the FWS allocation further and can provide more funds for community service. The following example illustrates how to generate extra dollars.

Example A

Assuming 50 community service jobs at an earning level of $1,000 per student, using the minimum required match of 25%:

50 x $1,000	=	$50,000
75% of $50,000	=	$37,500 (FWS funds expended)
25% of $50,000	=	$12,500 (Agency share)
Total Funds Available	=	$50,000

Example B

Assuming 50 community service jobs at an earning level of $1,000 per student, using a 40% match instead of the required 25% (60% / 40% split)

50 x $1,000	=	$50,000
60% of $50,000	=	$30,000 (FWS funds expended)
40% of $50,000	=	$20,000 (Agency share)

In this example, an additional $7,500 in FWS funds can be made available by increasing the match rate from 25 percent to 40 percent.

There are also other ways institutions can contribute to community service jobs. In-kind donations such as the following are very helpful in supporting community service programs, such as:

- Vehicles for use in community service programs
- Space on campus
- Academic credit for students participating in community service jobs
- Donation or use of equipment such as computers and fax machines
- Resources to provide training for FWS students, especially in literacy tutoring

Summer Programs

Another decision that will have to be made is when to spend FWS funds for community service. Some campuses prefer to spend their community service dollars during the summer, rather than during the regular academic year. If the institution decides to reserve its community service spending until the summer months, it is critical that adequate resources are budgeted to the summer jobs.

During the summer months, it is likely that many students will be required to pay social security taxes because they are not enrolled in school. Employers are required to match the social security tax withheld from student wages. FWS funds may not be used to pay for the employer's matching share of the social security taxes.

One drawback in waiting until summer is the potential that some of the students will not fulfil their work obligations, leaving the institution short of the required five percent community service expenditure, with no time to make up for the shortfall.

Reallocated Dollars

Each year, institutions are provided the opportunity to return FWS funds that they have not been able to use during the just completed award year to the Department of Education. The Department then reallocates the funds to eligible institutions for the upcoming award year. Institutions are allowed

to submit a request to the Department to receive a portion of the FWS funds available for reallocation.

To receive reallocated FWS funds, institutions must meet two criteria:

- During the prior award year, the institution must have used at least 10 percent of its FWS allocation to pay students employed in community service activities. For example, to qualify to apply for reallocated FWS funds for the 1997-98 school year, an institution must have used at least 10 percent of the funds it received for 1996-1997 to pay community services wages.
- The institution must have a "fair share shortfall," which means it must be eligible to receive more funds than are available for the program for the upcoming award year. The reallocated funds are distributed proportionally, based upon schools' fair share shortfalls.

Once the criteria are met, applying for reallocated FWS funds is a simple matter. The Department of Education provides a form to participating institutions each summer to permit them to report whether they have met the 10 percent community service requirement and to request supplemental FWS funds for the upcoming award year. However, there is an important limitation on the use of reallocated FWS funds. The institution must use all reallocated dollars to pay the wages of students employed in community service jobs. For campuses that are active in providing community service employment for their students during the regular academic year, the reallocated money can provide an excellent opportunity for summer community service employment.

Job Location and Development (JLD) Program

An institution can use the Job Location and Development (JLD) Program to locate and develop off-campus community service jobs for its students. There are frequent misconceptions about the use of FWS funds to operate a JLD Program, and how the JLD Program can be used to help campuses with the community service component of the FWS Program. To understand what can and cannot be accomplished by utilizing this option, an institution should focus on both the allowable uses of the JLD funds and on the allowable activities of the program.

Funding Issues

- An institution participating in the FWS Program may use up to the lesser of $50,000 or 10 percent of its total FWS allocation, to establish or expand a program to locate and develop off-campus jobs for its students, including community service jobs. **Approval from the Department of Education to begin using this option is not necessary.**
- The federal funds the institution sets aside from its FWS allocation for JLD activities may be used to pay up to 80 percent of the allowable costs (see below) of operating the program; the institution must provide the remaining 20 percent either in cash or services. The matching requirement cannot be waived, and the institution must maintain records that indicate the amount and sources of its matching share.

- Allowable costs of operating a JLD Program include:
  - staff salaries (and fringe benefits, if they are the same as those paid to other institutional employees in comparable positions and are not paid to a student employed through the FWS Program)
  - travel expenses related to JLD activities
  - telephone charges, including installation of a separate line, for JLD activities
  - costs for supplies, equipment, and furniture to support JLD operations
  - costs for advertising, printing, and mailing of materials that inform employers or students about the services offered by the JLD Program
  - costs for publicizing the jobs located by the JLD Program and for making information about community service opportunities available
  - costs to conduct workshops or other forums for students and employers
- JLD funds may not be used for indirect administrative costs (for example, a portion of the salary of an individual not directly involved in the program, such as the JLD director's supervisor).
- The institution must report annually on the FISAP the total student wages earned from employment that is a result of the JLD Program. The total wages must exceed the amount of federal funds spent on JLD operations. The program must therefore contain a mechanism to confirm when a student secures employment as a result of the JLD program and establish a reasonable method to estimate total wages earned from that employment.

Programmatic Issues

- JLD may be used to locate and develop community service jobs and should encourage students to participate in community service activities.
- JLD may not be used to locate or develop jobs on-campus at the institution itself or at other eligible institutions.
- The services of the JLD Program, such as access to employment opportunity information, workshops, and job fairs, must be made available to all of the institution's currently enrolled students regardless of financial need. All students, including those participating in the FWS Program, may use the services of the JLD Program.
- The purpose of the JLD Program is to locate off-campus jobs for all students regardless of need. Any job identified by the JLD Program can be a part of the institution's off-campus FWS Program, if the job and employer meet the eligibility requirements for that program. However, using JLD Program funds to find jobs only for FWS students is not acceptable.

The institution is provided further information on the JLD Program in Appendix 5.

Special Issues for Reading Tutors

When designing a reading tutor program, it is critical to consider two aspects of the program that may differ from other FWS employment. First, FWS tutors must be well trained. A college student

helping a child learn to read is more likely to succeed if the student first receives training. Second, FWS tutors who work off-campus may need additional compensation to help defray travel costs.

One important training option is the local school where the students will be tutoring. If they provide instruction in reading training for would-be tutors, the institution may wish to accept their training program and ensure the FWS tutors complete it. The FWS tutors can be compensated for the time they spend in training.

If the schools offer no training, it is still important to discuss with them the methods they use to teach reading. There are many different approaches to reading instruction, and generally teachers and school districts advocate one method over the others. It is therefore appropriate to assure that the FWS tutors are trained in the same methods used in teaching reading in the child's classroom. It is also an important step in developing positive relations with the local schools. If tutors use non-preferred methods, school officials might decide against using the FWS tutors entirely and conclude that the institution has no desire to work cooperatively with the school.

Tutors also need to be a part of a long-term approach to reading enhancement. The relationship they build with their students can have a considerable impact on the skill building and self-esteem of those students. It is crucial to the success of the program that both the community organization and the FWS tutor recognize the importance of the tutor-student relationship. In addition, because of the relationship that will be forged between the tutor and the tutee, the transition from one tutor to another at the end of the FWS assignment is important.

FWS students cannot be paid for the time they spend traveling or be reimbursed for their travel expenses. Since reading tutors will in all likelihood have to go off-campus, they may request a higher salary to compensate for the lost time and money spent commuting. There are some ways institutions can help with this problem. If a number of tutors all travel to the same location at the same time, it might be possible to provide them transportation via a university van. Conversely, the institution might want to consider holding tutoring sessions on the campus and work out transportation arrangements for the children with the local school district.

VI. MARKETING COMMUNITY SERVICE TO STUDENTS

Placement Versus Student Selection of Jobs

There are two basic methods for placing students in FWS jobs:

- Direct placement: A program administrator refers a student to a specific job, after screening the student to establish his or her qualifications and interests.
- Open market: Institutions make all employment opportunity information available to students seeking work, and the students select their own jobs. It is the students' responsibility to make arrangements for interviews with prospective employers.

Some institutions have a combination of both methods available for students (for example, entering first-year students are placed in jobs, but continuing upperclass students make their own selections).

A large majority of institutions currently use the open market approach. These institutions will need to consider how they can best market community service jobs so that FWS students will seek those jobs, thus allowing the institution to meet the mandated expenditures as well as its own goals.

Review Current Marketing Activities

When creating or expanding the community service program, the institution should review the current system used to provide employment opportunity information to students. The institution should:

- Look at the process and the information from the students' perspective
- Examine how best to highlight the availability of community service jobs
- Develop supplemental information covering transportation, safety, and responsibility issues for students who will be working off-campus
- Integrate their outreach efforts with FWS outreach activities if there is an existing community service or service learning office

Institutions may inform students about community service and particularly tutoring opportunities in a number of ways. They include placing announcements:

- in the school newspaper
- on the school radio station
- on bulletin boards in residence halls and student activity centers
- in students' financial aid application packets
- on electronic mail distribution
- in targeted letters
- with student affairs staff, student government, and activity organizations
- with residence hall staff for use in formal and informal settings

Mailings to Students

If information is already mailed to FWS students prior to their arrival on campus, the materials should be reviewed with an eye to incorporating an increased focus on the importance of community service jobs. Statements should be included from students who have worked in community service jobs and have positive things to say to incoming students about their experiences. If the institution will be adding a significant number of new positions for reading tutors, it may wish to consider a targeted mailing with details about the new opportunities that will be available.

New Student Orientations

It is important for the community service and FWS Program to become a part of the institution's orientation program for new students. The first step is coordination with the orientation program to determine how to establish a place and time to meet with new students about FWS employment opportunities. The orientation program is a good opportunity for emphasizing the benefits to students of working in community service jobs.

Job Fairs

Many institutions already conduct job fairs or similar events that allow students to shop around for their FWS job in one location. Such events should be publicized early to the contact individuals at

off-campus FWS sites, and they should be encouraged to come to campus for the job fair. Institutions that have not held job fairs in the past and that may receive little interest from on-campus employers, may want to consider holding an event tailored specifically to the off-campus program.

Letter from the President to New FWS Students

In addition to the general mailings already in place, the institution may want to send a letter from the school's president to new students, detailing the school's commitment to community service jobs and the importance of the reading tutors initiative. A letter from the president will elevate the importance of community service in the minds of students and their parents.

Coordination with Relevant Academic Departments to Promote Community Service Jobs

Academic departments can contribute significantly to the promotion of community service jobs, and specifically the need for reading tutors. There should be a plan in place to notify key faculty who could make brief announcements in class regarding the availability of community service jobs for FWS students. If community service jobs are still available after the academic year begins, the faculty could make announcements based on the number and types of community service jobs to be filled. A brief announcement to a captive audience can be very effective. In addition, many campuses have active service learning programs as part of their academic curriculum. These service learning programs can provide additional avenues for student involvement in community service as part of an enhanced academic experience.

VII. CONCLUSION

The development of FWS community service programs needs the support and involvement of the entire campus to be successful. Administrators charged with implementing an FWS community service program should reach out to all sectors of the campus. Many resources can be used to help plan, implement, and monitor the FWS community service program.

The preceding sections of this document focus on the statutory and regulatory requirements for the FWS Program and possible ways to meet those mandates. The appendices that follow provide examples of programs being developed and already underway that can be used as models for creating new programs on campuses all across the nation.

VIII. RED FLAGS FOR FEDERAL WORK-STUDY COMMUNITY SERVICE PROJECTS

Do

- Use **at least** five percent of the total Federal Work-Study allocation for community service employment
- Pay **at least** the minimum wage for the state or the Federal Minimum Wage ($4.75 per hour, $5.15 effective September 1, 1997), if the state minimum wage is less
- Notify students about the opportunity to participate in the institution's community service program
- Meet with community leaders to determine the needs and resources in the community (Use a Needs Assessment Form)
- Assure that jobs benefit the community and not just the institution and its students
- Always maintain appropriate time sheets for students employed in FWS community service programs

Do not

- **Do not** displace regular employees in making community service assignments for Federal Work-Study students
- **Do not** accept voluntary services from any paid Federal Work-Study student
- **Do not** enter into an off-campus employment agreement without a written contract approved by the institution's attorneys
- **Do not** place students in an off-campus situation unless there are agreements for proper training of the student
- **Do not** place students in an off-campus situation unless they are aware of any potential hazards and know what to do and whom to contact in case of an emergency

APPENDIX 1

Best Practices - Summaries of Exemplary Programs

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FLATHEAD VALLEY COMMUNITY COLLEGE (MT)

Flathead Valley Community College (FVCC) is a comprehensive community college serving an 8,855 square mile area of northwest Montana. The population of the service area is approximately 70,000. The annual unduplicated headcount is around 3,300. The cost of living is high because of the remoteness of the area, and wages are low. Fifty percent of degree-seeking students are Federal Pell Grant recipients.

The FVCC's work-study positions that qualify as community service are at the United Way, the college's library, which is open to and used by the public, the community education office, the adult basic education/GED program, and a local agency that works in the public schools with drug and alcohol awareness education programs.

Last year, the College added a service learning component to a number of their courses. One of those projects in the math/science area is a 15-hour tutoring assignment in a public school system. Because of the popularity of the project at the public schools, FVCC feels that the reading tutoring program will be equally welcomed and hopes to use its entire increased allocation for reading tutors.

To solicit interested elementary schools, the College has enlisted the help of a reading specialist who works with area school districts and teaches a remedial reading class at FVCC. In their first meeting, FVCC and the specialist decided to focus on the rural schools closest to the campus.

The reading instructor is part of the TRIO program (the Federal Special Services Programs for Disadvantaged Students) on campus, so she will provide some of the training for the students. She will also enlist the help of a coordinator, an AmeriCorps position, to be the liaison between the various parties. FVCC will advertise the program to the student body and will ask the "Introduction to Education Instructor/Elementary Education" adviser for potential tutors and a coordinator. The College will conduct interviews for the coordinator position and potential tutors this spring before the semester ends.

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RANDOLPH-MACON WOMAN'S COLLEGE (VA)

Randolph-Macon Woman's College is a private, four-year, liberal arts college dedicated to the education of women since its founding in 1891. The college currently enrolls 700 students from 44 states and 26 countries. The college is located in Lynchburg, Virginia, which has a population of 68,000 within a metropolitan area of 150,000.

As the first step of developing the Randolph-Macon Woman's College Off-Campus Community Service Work-Study Program, the financial planning and assistance staff met with the senior administration of the College, who provided full support for the project. The community service positions were included under the umbrella of service learning as an integral part of a student's undergraduate educational experience consistent with our mission statement of preparing students for "life in a full and lasting sense".

The director of the local United Way helped assess the needs of community service agencies in the Lynchburg area. The College visited with several area agencies to talk with them about the shortfalls that they experience daily in staffing and to learn about the programs that they offer to the community. The College also met with local school representatives to discuss the current tutorial needs of the city school system.

As the next step, the College sent a survey to students listing the types of community service employment that would be available. Interested students completed job applications, and interviews were scheduled with the College financial assistance staff and with agency representatives. The community service positions enable students to have significant interaction with the clients of participating agencies. Although the theme of helping others is the same, there is a great deal of diversity in the individuals who utilize each agency. Students have the opportunity to work with child care, tutoring, senior citizen programs, free clinic patients, and others. By offering a variety of positions, the College is able to match more closely a student's major and career plans with the needs of the agencies.

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NAVAJO COMMUNITY COLLEGE (AZ)

Navajo Community College is a two-year public institution which was established in 1968 as the first tribally controlled community college in the United States. Navajo Community College serves residents of the 26,000 square mile Navajo Nation which spans into the states of Arizona, New Mexico, and Utah and has a population of approximately 250,000. The main campus, located in Tsaile, Arizona, and four community campus locations in Window Rock, Chinle, Ganado, and Tuba City serve the Arizona residents. A campus in Shiprock and a community campus in Crownpoint provide educational services to New Mexico residents. The college currently enrolls approximately 2,000 students, and the number of students enrolled at the community campus accounts for half of the total student population. About 90 percent of their degree seeking students are Federal Pell grant recipients.

Student employment at Navajo Community College involves two different areas of employment: Federal Work-Study (FWS) and New Mexico Work Study (NMWS), which are coordinated and administered by the Financial Aid and Scholarships Offices at Tsaile Campus and Shiprock Campus. Federal Work-Study helps needy, eligible students by providing jobs at Navajo Community College, where they can work up to 40 hours per two-week pay period.

Some of the community service positions are located at the library (which is open to the public), the local Headstart Program, and the local Indian Health Service. In addition, jobs are available in tutoring GED students and local Tsaile Elementary School students. The College Learning Center employs students to offer tutoring services to the community and the College. The College asks local agencies to identify the types of positions they have. The agencies then furnish job descriptions, so the jobs can be matched with students who have an interest in those fields. The students are then notified and an interview is set up; job applications are completed with the financial aid office and with the College's personnel office. We try to employ students in the fields they are majoring in or have a career plan in. These community service positions help students to have hands-on experience in dealing with the people of the community. At the end of each employment term, students are evaluated by their employers, and both the student and the employer sign off on the evaluation form and submit it to the Financial Aid and Scholarships Office for further review.

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CENTRAL WASHINGTON UNIVERSITY (WA)

Central Washington University (CWU) staff, in Ellensburg, Washington, has worked with various campuses and community people to organize an America Reads program. They have divided their plans into a number of steps.

1. The Department of Teacher Education Programs is helping to identify potential reading tutors among students who have successfully completed the "teaching elementary reading" courses. Faculty will also announce the program to their classes and to all education majors. Interested students will be instructed to apply for financial aid as a first step.

2. Once CWU has a pool of interested students, CWU staff will check their eligibility for FWS. FWS students who want to participate in the ***America Reads Challenge*** and are Education majors, but who have not taken the Teaching Reading classes, will be paired with peer tutors who have taken the class.

3. CWU intends to include reflection sessions, led by professors, for the FWS tutors.

4. Professors in the Education Department will oversee the overall training of reading tutors, by hiring a graduate student to do the bulk of the training and to coordinate the time schedules at various reading sites. The graduate student will be paid from FWS, if he or she is eligible.

5. CWU is working with the Retired Seniors Volunteer Program (RSVP) and AmeriCorps. The RSVP volunteers will assist with training, and many of them will serve as tutors themselves.

6. CWU's College of Educational and Professional Studies has applied for a small grant to pay professors for their time in training and visiting sites to assist the reading tutors and the graduate assistant.

7. CWU is working with local Head Start programs to provide reading tutors.

8. CWU is investigating the possibility of summer tutoring programs, working in connection with the local school district and/or the city library. They are also attempting to encourage all students to read, not just slow readers. Therefore, they are hoping to place some students in positions where children read to them after school, because children love to have an adult listen to them read.

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MOREHOUSE SCHOOL OF MEDICINE (GA)

Morehouse School of Medicine (MSM) is a private, four-year, predominantly black institution established to recruit and train minority and other students as physicians and biomedical scientists committed to the primary health care needs of the underserved since its founding in 1975. The medical school currently enrolls 157 medical students, 13 Ph.D. students and 20 Masters of Public Health students. Although approximately 70 percent of these students are from Georgia, the remaining student population is from a wide geographical area. The college is located in Atlanta, Georgia, a truly international city since the hosting of the 1996 Olympic Games.

The MSM Federal Work-Study position that currently qualifies as community service is the employment of FWS students with the Atlanta Public Schools. This employment has proven to be successful and beneficial to the city of Atlanta. By sharing information in classroom situations, mentoring science/math projects, and tutoring, the FWS students are fulfilling the mission of the Morehouse School of Medicine. In addition, the students perform as Peer AIDS Education Trainers by providing AIDS education materials to youngsters in Elementary, Middle, and High School science classes and also by providing drug, tobacco, and alcohol education programs.

First, to solicit interested students, the Student Fiscal Affairs Office advertised the availability of funding from the Federal Work-Study Program for the students to share their acquired training and knowledge to the Atlanta community. The initial response from the students was overwhelming.

Secondly, the office staff met with authorized agency officers and MSM officials to stress the need for community service commitments from the Morehouse School of Medicine's students utilizing FWS funds.

Because of the rigorous nature of their training, medical students are sometimes unable to work full- or part-time. Currently, we are pursuing additional community service agency positions with Morehouse Medical Associates (MMA) and the Center for Disease Control (CDC) in order to provide our students with flexible working hours.

Morehouse School of Medicine will continue to advertise the FWS program to our student body for more participation in community service during the students' regular class schedules, months off and during the summer session.

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DARTMOUTH COLLEGE (NH)

Dartmouth College faces significant challenges in expanding FWS community service positions for its students. Because of the rural setting of the college, there are few opportunities that are not already being utilized. To participate in additional rural outreach programs, students would need transportation services that do not currently exist. Dartmouth tried allowing students to use their FWS jobs at community service organizations in other regions of the country, but found administration of the program too difficult in terms of verifying work hours, paying students and collecting payments from the service organizations. Dartmouth therefore decided to look within the College to develop additional community service positions. The following three examples show the types of opportunities they found.

ArtCare. In Spring 1996, under the auspices of the C. Everett Koop Institute at Dartmouth, ArtCare was created. The purpose of the program is to design and test methods of using the arts and humanities to support the healing process. The program hires students to develop art activities at the Dartmouth Hitchcock Medical Center. Activities include: art projects that can be taught to patients; using the arts to support young patients and help them lead as normal a life as possible; allowing bed-bound patients to take part in creative activities; and arranging for student musicians to perform for patients. The program has been successful, and the Koop Institute is planning to create a system to encourage greater participation.

The Hopkins Center. FWS student employees coordinate the travel, publicity, and scheduling to bring elementary and secondary school students to the campus to participate in the activities of the Hopkins Center, Dartmouth's performing arts center. The Center's activities include: bus-in school performances; teacher, student and community workshops; class visitations and assembly programs; and a volunteer program that takes Dartmouth students into local schools. FWS students also handle the scheduling needs of students who go to local schools.

The Volunteer Spirit. The spirit of volunteerism at Dartmouth is very high, and great care has been taken not to deter that spirit. The College's Tucker Foundation has spent more than 45 years "furthering the moral and spiritual life of the College." Twenty-five percent of Dartmouth's students volunteer through the Foundation. The College's student employment office works with the Foundation to develop work-study positions that assist in the administration of the many volunteer programs. Plans are also being developed to expand tutoring activities already in place into more formalized FWS positions as part of the ***America Reads Challenge***.

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GUILFORD COLLEGE (NC)

Guilford College, a small liberal arts school in Greensboro, N.C., begins each school year with a Volunteer Fair held during the first week of classes. Over 50 non-profit agencies and community organizations attend the fair to recruit Guilford College student volunteers. Students may talk with staff from several programs and make an informed decision about their service placements. Faculty from several academic classes who require a community component as part of the course requirements send students to the fair to select their placements.

The college provides ongoing support to students through Project Community, a student-run community service office supervised by the Director of Internships and Service Learning. Work-study students and community service enthusiasts staff the office to strengthen our campus-wide ethic of service and provide students with ongoing support in their community service commitments. Project Community staff organize reflection opportunities, provide ongoing placement assistance, and sponsor weekend service projects.

The student Community Senate (or student government) has authorized a Service Coordinating Council to oversee the disbursement of $10,000 from Senate funds to student organizations for community projects. A representative from each student organization engaged in community service or working for social change sits on the council which meets bi-monthly. The council reviews funding proposals for projects in the wider community and serves as a stimulus for co-sponsorship of service events.

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RUTGERS UNIVERSITY (NJ)

To ensure that a community service program or tutoring program is meeting its goals in terms of students, an institution should have follow-up procedures for getting feedback on student reactions to their experiences. Rutgers University surveys its FWS community service students, including students who work as tutors, each year. Responses are optional, with only a small percentage of students responding. However, responses that are negative or that contain suggestions for change are evaluated by the staff to determine if they can be incorporated into the program for the next year. For the most part, the responses are overwhelmingly positive. The following are a few examples of responses for 1995-96.

> "By interacting with the kids, I learned what they enjoy doing most, like being read to or coloring, and what methods the teachers use to get their students interested in learning."
>
> "Through my work at the New Brunswick Adult Learning Center, I have had the chance to work with a diverse group of people. I feel good to be able to work and help people of the New Brunswick community. I have had the opportunity to develop my Spanish speaking skills as a math tutor in the Spanish GED class. Also, I am learning resume-writing and counseling as I work with the career development coordinator. Most importantly, though, I think I've learned a great deal about relating to all types of people. Through the CASE program, as a team leader, I have developed organizational and supervisory skills. I have gained the practical experience of coordinating, monitoring volunteers, and assuring they are getting as much out of their volunteer experience as possible."
>
> "I feel that I am actually helping to make a difference in the community. It has also helped me to define my career goals."
>
> "The newsletter we published allowed people to know their rights. The Tenants Rights Handbook, which I worked on, was an especially promising way of educating citizens of their rights. I feel the community service option is something that was extremely beneficial to me."

Contact:

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ARKANSAS STATE UNIVERSITY (AR)

Arkansas State University, located in the Arkansas Delta, is the only comprehensive public university located in this region. Arkansas State University has branch campuses located at Beebe (White County) and Mountain Home (Baxter County) and a satellite campus at Newport (Jackson County). ASU also offers courses at off-campus locations. The enrollment at our main campus for the Fall of 1996 was 9,828 students.

As the first step in developing the Arkansas State University Community Service Program, we met with Administration of most of the public high schools in the northeastern area of the state to determine to what extent they might become involved in the project. We currently have students performing community service in 10 to 15 public schools in the northeast Arkansas area. These students serve in several capacities, such as tutors, teacher aides, and readers, and several students provide private instruction in various musical instruments.

We then met with our Mayor and his staff, who were pleased to be able to participate in this program. We have signed agreements with the Mayor's Office, the County Clerk's Office, the City Engineer's Office, the Office of Parks and Recreation, and the Public Works Office, as well as the University Museum, which offers a variety of community services such as the summer enrichment program.

As our next step, we met with officials of the Office of Human Services, Legal Services of Northeast Arkansas, several area agencies on aging, the Arkansas Services Center, as well as officials of Abilities Unlimited, an agency that offers training and support to physically and mentally handicapped persons. We currently have students working and providing services for these agencies such as giving supervision, organizing and conducting recreation or play time activities, outings, and assisting them with shopping.

Our most recent step has been to place several students in the Craighead Public Library and the Green County Library. We are currently looking at increasing our number of reading tutors in both the public schools, as well as placing some workers in the Head Start Program.

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SUSSEX COUNTY COMMUNITY COLLEGE (NJ)

Sussex County Community College (SCCC) is a small, comprehensive community college serving northwestern New Jersey. Although located in a rural area, a large number of residents travel out of the county to work in locations such as New York City. The unduplicated head count at the College both full and part time as of Spring 1997 was 2,160.

SCCC has been active over the past several years in placing students off-campus at community service learning locations such as the American Cancer Society, so the concept of extending FWS students into school systems as "Reading Buddies" seemed a natural next step.

The College designated a faculty member who is a reading specialist to act as a coordinator between the College and county school systems. The coordinator identified schools interested in this new service and met with interested key personnel at each school to determine their needs. The coordinator used this information to develop an individualized reading mentor program. The Reading Buddies program is designed to provide help for students who have not been provided with strong reading backgrounds and do not have a feel for the written word.

The Reading Buddy "Mentor" is a special person who values reading, likes children, and is willing to work to improve children's literacy skills by working one on one with a child who is experiencing reading difficulty. The warm rapport a Reading Buddy can provide offers a safe environment for children to experiment with the written word and can provide the emotional security needed to develop strong reading skills and an interest in reading.

In addition to SCCC students serving as Reading Buddies, there will be a parental component to the program. This aspect of the program will include information on providing an effective reading environment at home, an introduction to children's literature, and specific techniques that parents can use to help develop their children's literacy skills at home.

Students are currently being screened, matching majors against FWS eligibility. The coordinator will conduct training sessions with selected students during the summer to prepare for fall placement in the area schools. The coordinator will monitor the program to assure that students are providing the correct services to the school system and perform year-end evaluations. Since this is a new venture, it is expected that the changes and improvements may be made even as the year progresses.

It is felt that the Reading Buddies program will provide a vital link between the schools and college and stimulate reading skills and growth with children at an early age.

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STATE OF WASHINGTON'S COMMUNITY SERVICE PROGRAMS (WA)

The State of Washington uses its state funded work-study program and the Federal State Student Incentive Grant Program to fund community service demonstration projects throughout the state. The following is a list of projects for 1996-97.

The Family Involvement Project: Breaking Down Barriers to Parental Participation in Education **(Pacific Lutheran University)**

Young Ellenburg Artists (YEA!): Establishing College Students as Role Models for At-Risk Youth Through Art **(Central Washington University)**

Law Students Working/Learning in a Community-Based Dispute Resolution Center **(Seattle University - School of Law)**

Adult Basic Education - Learning Through Sharing: Those Who Did Help Those Who Can **(Big Bend Community College)**

Expanding Horizons: Enhancing Cultural Awareness in a Childcare Setting **(Washington State University)**

Multicultural Workforce Alliance with Medicine Creek Tribal College **(Pierce College)**

Oil and Wildlife Don't Mix: A Collaborative Service Learning Approach to Hazardous Spills, Emergency Planning and Pollution Prevention **(Gays Harbor College)**

Causeways to Service: Faculty Outreach, Evaluation Research, and Community Support **(Western Washington University)**

Multicultural Students Teaching/Mentoring in a Community Based After-School Program **(Tacoma Community College)**

Tutoring and Mentoring in Seattle's American Indian/Alaska Native Community **(Seattle University)**

Inter-Generational and Multicultural Mentorship Project Incorporating the Exploration of Fine Arts **(Cornish College)**

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STATE UNIVERSITY OF NEW YORK (SUNY) COLLEGE AT BROCKPORT (NY)

SUNY Brockport has a long history with FWS community service and tutoring programs. The first program, called the Brockport Literacy Project, was for adult learners. That program, which ran from 1983 to 1989, was funded through the federal government's Adult Literacy Initiative.

The program required the University to work with two local nonprofit literacy organizations, Promote Yourself and the Brockport Migrant Education Project. They handled the recruitment, training, and supervision of the students with the assistance of a student coordinator, hired with FWS funds. For the most part, students were required to complete tutor training in basic reading.

In 1990, the community service agenda for FWS broadened to encompass community service generally. SUNY Brockport used funds from the FWS Program to meet the broader challenge, but continued to maintain the Literacy Project using institutional dollars. To meet the five-percent mandate that was enacted in 1992, SUNY Brockport established contracts with its previous literacy partners. Students could be paid through the FWS Program for tutoring or receive academic credit through the Student Literacy Corps, through which SUNY Brockport also received a grant. When the Student Literacy Corps was discontinued in 1994, SUNY Brockport continued the program using institutional resources.

In 1992, based on the strength of the existing literacy program, SUNY Brockport was awarded a $189,000 grant from the U.S. Department of Education's Workplace Literacy Program to establish an in-house tutoring program for college employees who lacked basic literacy skills. Workers from the physical plant, food service, and ground crew were recruited and matched with college students who were trained and paid as tutors.

SUNY Brockport continues to promote literacy and to place FWS tutors, volunteers, and interns in a variety of community agencies.

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GEORGETOWN UNIVERSITY (DC)

Since the announcements of increased FWS allocations for 1997-98 and the ***America Reads Challenge***, Georgetown University has worked collaboratively with local colleges and universities to implement a reading tutor program with the District of Columbia Public Schools. This effort is one piece of a larger local initiative to provide substantial, multifaceted assistance to our city's public school system. It is also only one part of Georgetown's ongoing community service efforts, which include numerous other focused tutorial programs and an array of social, medical, and legal service activities.

Faced with daily news reports of the public school system's challenges, the community has rallied in response. In addition to faculty and staff representing many areas of the higher education institutions, the reading tutor effort has involved the Corporation for National Service and numerous other agencies and individuals that have an interest in assisting the public school system.

Several issues became apparent during a series of initial meetings:

- the need for a structure to coordinate the reading tutor program on behalf of the school system which welcomes the assistance but does not have the resources to support it;
- the need for coordination among the colleges and universities with regard to the technical, administrative, and policy aspects of the FWS program; and
- the need to recognize the numerous volunteer initiatives already in place and integrate the FWS reading tutor program with those efforts.

The school system readily identified the elementary schools that are most in need of assistance and asked that the effort be focused on these targeted schools in the first year. The Corporation for National Service has worked to establish a coordinating structure on behalf of the school system which will combine resources from AmeriCorps, Communities in Schools, and an advisory committee.

Faculty members and other interested individuals are working to formulate a system-wide training program that will incorporate and support the teaching methods used in the schools, and will be structured to become self-sustaining with a "training of trainers" component. The training component will eventually be made available to all tutors, including FWS students and volunteers.

The volunteer and public service staff from a number of local colleges and universities are combining forces to submit a grant proposal that will address the need for staff resources to coordinate operations, scheduling, transportation, and to augment the connection of the reading tutor experience to the academic environment.

The financial aid and student employment staff from the local colleges and universities are meeting to discuss and resolve issues related to the functional aspects of using the FWS program to provide reading tutors, with the goal of streamlining existing differences to minimize the administrative work burden on the school system staff. This agenda includes a consolidated time reporting form that will be used by all of the tutoring sites, a review of pay rates for off-campus FWS employment, a review

of financial aid packaging and FWS award amounts, and coordination of each institution's employment paperwork and schedules.

The announcement of increased FWS allocations could not have come at a better time in the District of Columbia. The city's colleges and universities have long been operating programs to assist the community, both with volunteer efforts and through the FWS program. The ***America Reads Challenge*** has brought together the talents and expertise needed to put the increased FWS allocations to the best possible use for our community.

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TECHNICAL CAREER INSTITUTE (NY)

Technical Career Institute (TCI) is a proprietary school located in New York City, offering associate degrees in various fields including electronics engineering, technology, industrial electronics, air conditioning, heating and ventilation technology, and office technology. Enrollment is about 3,500 students.

A participant in Federal Work-Study for the first time in 1996-97, TCI has been providing community service opportunities to FWS and other students under the auspices of the Dare to Dream Project, which was founded by TCI Humanities instructor Robert Lubell in 1993. The Dare to Dream Project solicits donations of computers from major corporations, individuals, and small businesses. The computers are repaired and/or upgraded by TCI students and then donated to the developmentally disabled, individuals with spinal cord injuries, public schools, community centers, veteran organizations, hospitals and the terminally ill, and charitable organizations throughout the five boroughs of New York City. In addition to FWS students, TCI places over 300 volunteer students with the Dare to Dream Project.

For 1997-98, TCI will be receiving a significant increase in FWS funds, which will allow for expansion of FWS students in the Dare to Dream Project. In addition, TCI is planning to assist several local public elementary schools by providing FWS students as bilingual reading tutors.

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REVIEWS OF OTHER COMMUNITY SERVICE PROGRAMS

SAN FRANCISCO STATE UNIVERSITY (CA)

At San Francisco State University, a partnership has been established between the University and 12 elementary schools. Through a coordinated effort by the University's Department of Elementary Education and the Office of Student Financial Aid, students eligible for work-study will be able to apply to participate in the ***America Reads Challenge*** for Fall 1997. Initially the Elementary Education Department will select and train some 60 students. The students will help evaluate the program and provide ongoing training for tutors. San Francisco State will seek additional funding to expand this program and implement the reading initiative in six new schools.

BROWN UNIVERSITY (RI)

Brown University's current off-campus FWS Program attempts to address the vocational needs of the students and to meet community-based priorities. Jobs funded by the FWS Program are integrated with the students' liberal arts education and explicitly develop new skills in students. It is a flexible program with many opportunities for students and community members to participate in defining jobs or projects. Students may approach a community-based organization with the idea of a job or project or may apply for a position developed and posted by a community-based organization. Students must apply collaboratively with the community-based organization at which they hope to work. Applications are selected by a committee from the Financial Aid Office, Career Planning Services, and the Swearer Center for Public Service. Brown is developing plans to link the new ***America Reads Challenge*** tutoring effort to the ongoing model.

OHIO UNIVERSITY (OH)

At Ohio University, the Center for Community Service and the Office of Student Financial Aid have collaborated in developing three different approaches to community service Federal Work-Study. During the academic year, students are 1) placed with community agencies where they work scheduled hours each week; 2) assigned to lead campus-based volunteer efforts; or 3) during summer, given the opportunity to perform service on a full-time basis through the Summer Service Corps, which puts them to work on intensive, 10-week-long community projects.

CLARION UNIVERSITY OF PENNSYLVANIA (PA)

Clarion University of Pennsylvania's FWS Program, established in conjunction with the national Adopt-A-School program and the National Interfraternity Council, surveys community members each year to determine appropriate service sites. FWS students interested in community service complete an application form, interview with an approved agency and are placed based on their suitability. Once a match has been made, there is an orientation program for the students. They receive a manual detailing position responsibilities, site expectations, an overview of the FWS Program, and an off-campus, work-study agreement. Reflection sessions and evaluations of both the students and the sites conclude the program.

COLORADO STATE UNIVERSITY (CO)

Colorado State University employs twenty students as part-time staff in its Office of Community Services. The students, who receive wages through the FWS Program or student fees, contribute 15 hours a week at the center. Paid staff work alongside student volunteers, and all receive training in volunteer management, diversity, and reflection facilitation. The office gears staff duties so that students work in areas related to their academic goals or individual interests and skills.

APPENDIX 2

A-I. **Sample Contracts for Community Service Programs**

A-II. **Needs Assessment Form**

A-III. **Time Sheets**

A-1. Sample Contracts

Model Off-Campus Agreement

(The paragraphs below are suggested as models for the development of a written agreement between an institution of higher education and a Federal, State, or local public agency or private nonprofit organization which employs students participating in the Federal Work-Study program. Institutions and agencies or organizations may devise additional or substitute paragraphs which are not inconsistent with the statute or regulations.)

This agreement is entered into between _____, hereinafter known as the "Institution," and _____, hereinafter known as the "Organization," a (Federal, State, or local public agency), (private nonprofit organization), (strike one), for the purpose of providing work to students eligible for the Federal Work-Study program [FWS].

Schedules to be attached to this agreement from time to time must be signed by an authorized official of the institution and the organization and must set forth--

(1) brief descriptions of the work to be performed by students under this agreement;
(2) the total number of students to be employed;
(3) the hourly rates of pay; and
(4) the average number of hours per week each student will be used.

These schedules will also state the total length of time the project is expected to run, the total percent, if any, of student compensation that the organization will pay to the institution, and the total percent, if any, of the cost of employer's payroll contribution to be borne by the organization. The institution will inform the organization of the maximum number of hours per week a student may work.

Students will be made available to the organization by the institution to perform specific work assignments. Students may be removed from work on a particular assignment or from the organization by the institution, either on its own initiative or at the request of the organization. The organization agrees that no student will be denied work or subjected to different treatment under this agreement on the grounds of race, color, national origin, or sex. It further agrees that it will comply with the provisions of the Civil Rights Act of 1964 (Pub. L. 88-352; 78 Stat. 252) and Title IX of the Education Amendments of 1972 (Pub. L. 92-318) and the Regulations of the Department of Education which implement those Acts.

(Where appropriate any of the following three paragraphs or other provisions may be included.)

(1) Transportation for students to and from their work assignments will be provided by the organization at its own expense and in a manner acceptable to the institution.

(2) Transportation for students to and from their work assignments will be provided by the institution at its own expense.

(3) Transportation for students to and from their work assignments will not be provided by either the institution or the organization.

(Whether the institution or the organization will be considered the employer of the students covered under the agreement depends upon the specific arrangement as to the type of supervision exercised by the organization. It is advisable to include some provision to indicate the intent of the parties as to who is considered the employer. As appropriate, one of the following two paragraphs may be included.)[1]

(1) The institution is considered the employer for purposes of this agreement. It has the ultimate right to control and direct the services of the students for the organization. It also has the responsibility to determine whether the students meet the eligibility requirements for employment under the Federal Work-Study program, to assign students to work

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for the organization, and to determine that the students do perform their work in fact. The organization's right is limited to direction of the details and means by which the result is to be accomplished.

(2) The organization is considered the employer for purposes of this agreement. It has the right to control and direct the services of the students, not only as to the result to be accomplished, but also as to the means by which the result is to be accomplished. The institution is limited to determining whether the students meet the eligibility requirements for employment under the Federal Work-Study program, to assigning students to work for the organization, and to determining that the students do perform their work in fact.

(Wording of the following nature may be included, as appropriate, to locate responsibility for payroll disbursements and payment of employers' payroll contributions.)

Compensation of students for work performed on a project under this agreement will be disbursed--and all payments due as an employer's contribution under State or local workers' compensation laws, under Federal or State social security laws, or under other applicable laws, will be made--by the (organization) (institution) (strike one).

(Where appropriate any of the following paragraphs may be included.)

(1) At times agreed upon in writing, the organization will pay to the institution an amount calculated to cover the organization's share of the compensation of students employed under this agreement.

(2) In addition to the payment specified in paragraph (1) above, at times agreed upon in writing, the organization will pay, by way of reimbursement to the institution, or in advance, an amount equal to any and all payments required to be made by the institution under State or local workers' compensation laws, or under Federal or State social security laws, or under any other applicable laws, on account of students participating in projects under this agreement.

(3) At times agreed upon in writing, the institution will pay to the organization an amount calculated to cover the Federal share of the compensation of students employed under this agreement and paid by the organization. Under this arrangement the organization will furnish to the institution for each payroll period the following records for review and retention:

(a) Time reports indicating the total hours worked each week in clock time sequence and containing the supervisor's certification as to the accuracy of the hours reported;

(b) A payroll form identifying the period of work, the name of each student, each student's hourly wage rate, the number of hours each student worked, each student's gross pay, all deductions and net earnings, and the total Federal share applicable to each payroll;[2] and

© Documentary evidence that students received payment for their work, such as photographic copies of canceled checks.

[1] It should be noted that although the following paragraphs attempt to fix the identity of the employer, they will not necessarily be determinative if the actual facts indicate otherwise. Additional wording which specifies the employer's responsibility in case of injury on the job may also be advisable, since Federal funds are not available to pay for hospital expenses or claims in case of injury on the job. In this connection it may be of interest that one or more insurance firms in at least one State have in the past been willing to write a workers' compensation insurance policy which covers a student's injury on the job regardless of whether it is the institution or the organization which is ultimately determined to have been the student's employer when he or she was injured.

[2] These forms, when accepted, must be countersigned by the institution as to hours worked as well as to the accuracy of the total federal share which is to be reimbursed to the organization or agency.

SAMPLE UNIVERSITY
OFF-CAMPUS FEDERAL WORK-STUDY AGREEMENT
EFFECTIVE FROM 07/01/96 TO 06/30/97

This agreement is entered into between **Sample University**, hereinafter known as the "Institution" and **Qualifying Agency**, hereinafter known as the "Organization," a federal, state, or municipal agency or a private nonprofit organization, for the purpose of providing work to students eligible to participate in the Federal Work-Study (FWS) Program.

The parties agree to and understand that work to be performed under this agreement is to be in the public interest, and which (1) will not result in the displacement of employed workers or impair existing contracts for services; (2) will be governed by such conditions of employment, including compensation, as will be appropriate and reasonable in light of such factors as type of work performed, geographical region and proficiency of the employee and as mutually agreed by the Institution and the Organization; (3) does not involve the construction, operation, or maintenance of so much of any facility as is used, or is to be used, for sectarian instruction or as a place for religious worship; and (4) does not involve any partisan or nonpartisan political activity associated with a candidate, or contending faction or group, in an election for public or party office.

FWS Employment Authorization Forms, signed by an authorized official of the Organization, and Job Description Forms, will set forth the names of students employed under this agreement, their hourly rates of pay, description of duties, and maximum gross earnings per student, and are considered part of this agreement.

During periods of regular enrollment, students employed under this agreement may work no more than twenty (20) hours per week. When classes are not in session (during vacation breaks and summer), students may work forty (40) hours or more per week, and are entitled to overtime pay for any hours worked in excess of forty (40) per week.

Students can only be paid for hours actually worked, and may not be paid for lunch, vacation, holiday, sick days, or other hours not actually worked. When a student's accumulated gross earnings reach his/her Federal Work-Study Award, (s)he must stop working under this agreement.

Students will be made available to the Organization by the Institution as the Institution shall determine for performance of specific work assignments. Students may be removed from work on a particular assignment or from the Organization by the Institution, either on its own initiative or at the request of the Organization.

SAMPLE UNIVERSITY
OFF-CAMPUS FEDERAL WORK-STUDY AGREEMENT
EFFECTIVE FROM 07/01/96 TO 06/30/97

The Organization agrees that no student will be denied work or subjected to different treatment under this agreement on the grounds of race, color, religion, sex, or national origin, and that it will comply with the provisions of the Civil Rights Act of 1964 (P.L. 88-352; 78 Stat. 252) and the Regulations of the Department of Health, Education and Welfare which implement that act, and Title IX of the Education Amendments of 1972 (Pub. L. 92-318).

The Institution is considered the employer for purposes of this agreement. It has the ultimate right to control and direct the services of each student for the Organization. It has the responsibility to determine whether the students meet the eligibility requirements for employment under the Federal Work-Study Program, to assign students to work for the Organization, and reserves the right to determine whether students are performing appropriate work. The Organization's right is limited to direction of the details and means by which the result is to be accomplished.

Transportation for students to and from their work assignments will not be provided by either the Institution or the Organization. In the event of injury incurred by a student employee while acting within the scope of his/her duties, the Institution shall assume responsibility as employer.

Compensation for work performed on a project under this agreement will be disbursed--and all payments due as an employer's contribution under State or local worker's compensation laws, under Federal or State social security laws, or under any other applicable laws, will be made--by the Institution.

The student will be paid by the Institution based on the established hourly rate and number of hours worked. A written record of hours worked is to be submitted by the Organization to the Institution on a biweekly basis in accordance with a schedule issued annually by the Institution. At the Institution's request, the Organization agrees to confirm these hours by authorized signature of an Organization official on verification statements before the Institution will release payments to the students employed under this agreement.

This agreement requires that the Organization will pay twenty five percent (25%) of student compensation, and one hundred percent (100%) of any and all payments required to be made by the Institution under Federal or State social security laws, or under any other applicable laws. The Organization will be billed on a quarterly basis and will remit payment to the Institution no later than 30 days after the billing date.

OFF-CAMPUS FEDERAL WORK-STUDY AGREEMENT 1996-97 ACADEMIC YEAR
(EFFECTIVE FROM 07/01/96 - 06/30/97)

ORGANIZATION DESCRIPTION

NAME OF ORGANIZATION	TELEPHONE
ADDRESS	
ORGANIZATION STATEMENT OF PURPOSE	
ORGANIZATION SOURCE OF FUNDING	
TYPE OF ORGANIZATION (please check)	IRS EXEMPTION NO.
WHAT OTHER COLLEGES' WORK-STUDY STUDENTS ARE EMPLOYED AT YOUR ORGANIZATION?	
INDIVIDUAL RESPONSIBLE FOR THE RECEIPT AND PAYMENT OF INVOICES	
NAME	TITLE
ADDRESS	TELEPHONE

Authorized Signature(s) for Time Reporting:

Printed Name	**Title/Department**	**Signature**

Contract Authorization:

Date: _____ Signed (for the Institution): _____

John Q. Public
Director of Financial Aid

Date: _____ Signed (for the Organization): _____

Printed/Typed Name: _____

Title: _____

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A-II. Needs Assessment Form

Needs Assessment for FWS Community Service Program

Agency Name: Date:
Contact Name: Phone:
Address:

1. _____ Non-Profit _____ For Profit

2. Agency Mission Statement and Description of Clients Served

3. Agency Funding Sources (check all that apply):
   _____ Federal _____ State _____ County/City _____ United Way
   _____ Other (explain)

4. Agency's fiscal year: _____ to _____

5. Agency Staffing (number of positions):

   _____ Full-time paid staff
   _____ Part-time paid staff
   _____ Student employees
   _____ Volunteers

6. How many student jobs may be available at your agency during:
   Summer 199x _____ 199x-9x Academic Year _____ Summer 199x _____

7. For each student job expected to be available as indicated in #6, provide the following information, attaching a separate sheet for each position.
   Job Title
   Rate or Range of Pay per hour
   Begin and End Dates
   Work Schedule - Days and Hours
   Total Hours/Week
   Description of Duties
   Qualifications and Experience (indicate preferred or required)

8. Has your agency hired students through the Federal Work-Study Program in the past? _____
   If Yes: number of students _____
   dates employed _____
   avg length employed _____

9. Additional Comments

SAMPLE UNIVERSITY

Off-Campus Federal Work-Study Program
1996-1997 Student Employee Time Sheet and Verification Form

Organization Name:

Student's Name:_____ Social Security No.:_____-_____-_____

FROM (Pay Period Beginning Date):_____ TO (Ending Date):_____

* Enter time in and time out followed by = total hours for each day below

	Week 1	Week 2
Sunday	=	=
Monday	=	=
Tuesday	=	=
Wednesday	=	=
Thursday	=	=
Friday	=	=
Saturday	=	=
Total Hours		

Pay Period Total Hours:_____

_____ _____
Student's Signature Date

VERIFICATION OF HOURS

Please verify that the correct number of hours have been submitted for the this payroll period.
Student Employee Time Sheet and Verification Form must be faxed to (311) 555-1212 by 10:00AM on the Monday following the end of the payroll period.

I certify that this student has worked the hours reported on this time record and has earned the amount being paid.

_____ _____ _____
Supervisor's Signature/ Authorized Signature Printed Name Date

APPENDIX 3

Information on Sources that Can Be Contacted for Assistance

Resources

The U.S. Department of Education will issue a revised version of the *Student Financial Aid Handbook*, available for 1997-98. It expands on the community service and JLD components.

The following Internet addresses can help you locate the most up-to-date information and be a part of the ongoing discussions about the Federal Work-Study Program, community service, and the ***America Reads Challenge***.

U.S. Department of Education Homepage: www.ed.gov
America Reads Challenge: www.ed.gov/inits/americareads/

Student Financial Assistance Electronic Bullentin Board (BBS)
http://sfa.ope.ed.gov/

The STUDEMP (issues related to student employment) list server:
To join, send the e-mail message (not subject):
sub STUDEMP YourFirstname YourLastname
to: LISTSERV@LISTSERV.ARIZONA.EDU
To review discussion logs at web site:
http://listserv.arizona.edu/lsv/logs.html

Corporation for National Service web site
http://www.cns.gov
Phone number: 202-606-5000

The AmericaReads list server
To join, send the email message (not subject): subscribe americareads
to: majordomo@etr-associates.org
Phone number: 202-401-8888

APPENDIX 4

Audit and Program Review Findings in FWS Program Administration

Audit and Program Findings in FWS Administration

The following are items which have resulted in findings against institutions in audit and program reviews of FWS administration in the past. By following the guidance found in the Student Financial Aid Handbook issued by the U. S. Department of Education and in the regulations found at 34 CFR 673 and 675 (effective July 1, 1997), these and other findings will be avoided.

1. Earnings not monitored.
2. Earnings credited to student account.
3. Off-campus employment agreement not available.
4. Time cards not signed by supervisor.
5. Improper payments for hours worked.
6. Ineligible employment
7. Job descriptions not available.
8. Matching requirements not met or untimely.
9. FWS job displaced regular employee.
10. Missing time cards.
11. FWS student selection policy inadequate.
12. FWS carry forward/back used incorrectly or not documented.
13. Less than 5 percent FWS used for community service.

APPENDIX 5

Job Location and Development Questions and Answers

Job Location and Development Program

1. Question: What is the Job Location and Development (JLD) Program?

   Answer: The JLD Program is one of the Federal Work-Study programs. An institution is allowed to use part of the Federal funds it receives under the Federal Work-Study (FWS) Program to establish or expand a JLD Program to locate and develop off-campus jobs for currently enrolled students who want jobs, regardless of their financial need. The JLD Program encourages students to participate in community service activities.

2. Question: What is the specific dollar limit on the FWS Federal funds that may be used for the JLD Program?

   Answer: An institution may use up to the lesser of $50,000 or 10 percent of its total FWS allocation to establish or expand a JLD Program.

3. Question: Does the JLD Program require institutions to provide an institutional share?

   Answer: Yes. When an institution participates in the JLD Program, the Federal funds may pay up to 80 percent of the allowable costs. The institution must provide the remaining 20 percent of allowable costs either in cash or in services. The institution's 20 percent share may be either (1) 20 percent of each allowable cost, or (2) varying percentages of allowable costs as long as its total expenditures of institutional funds and/or provision of services equals at least 20 percent of the total allowable costs for the JLD Program. The institution must maintain records that indicate the amount and sources of its share. The fiscal procedures and records requirements for JLD are the same as those for the FWS Program.

4. Question: Does the JLD Program provide for a waiver of the institutional share requirement?

   Answer: No. The JLD institutional share requirement, unlike the institutional share requirement for FWS earnings, cannot be waived.

5. Question: What are allowable costs of carrying out the JLD Program?

   Answer: Allowable costs of carrying out the JLD Program include:

- o staff wages and salaries (may also include fringe benefits if they are the same as those paid to other institutional employees in comparable positions and the fringe benefits are not paid to an FWS student);
- o travel expenses;
- o printing and mailing costs;
- o telephone charges, including installation of a separate line for off-campus employers;
- o costs for supplies, equipment, and furniture;
- o newspaper or other types of advertising; and
- o costs for workshops for students and employers.

6. Question: What costs are not allowable under the JLD Program?

Answer: Costs that are not allowable are costs related to purchasing, constructing, or altering the facilities that house a JLD project. Indirect administrative costs also are not allowable. One example of an indirect administrative cost is a portion of the salary of someone who is not directly involved in the program such as the JLD director's supervisor. Other examples of indirect administrative costs are lighting, heating, or custodial costs incurred as a part of the normal operations of the facility in which the JLD Program is administered such as the financial aid or placement offices.

7. Question: If an institution is eligible to participate in the FWS Program, is it automatically qualified for JLD?

Answer: Yes. An institution eligible to participate in the FWS Program is also eligible to participate in the JLD Program.

8. Question: When an institution that is currently participating in the FWS Program wants to participate in the JLD Program must it make prior contact with the Department or have its Program Participation Agreement (PPA) revised?

Answer: No. An institution that is currently participating in the FWS Program does not have to contact the Department for the purpose of participating in the JLD Program. The fact that the institution has an executed PPA for the FWS Program means that the institution is also able to participate in the JLD Program without any prior contact with the Department or revision to its PPA. The institution under the PPA agrees to

administer the JLD Program according to the appropriate statutory and regulatory provisions.

9. Question: Is there any information that an institution must provide to the Department if it participates in the JLD Program?

Answer: Yes. An institution that participates in the JLD Program during an award year must provide information about its JLD activities on the Fiscal Operations Report and Application to Participate (FISAP). The institution provides total JLD expenditures, Federal expenditures for JLD, institutional expenditures for JLD, number of students for whom jobs were located or developed, and total earnings for those students.

10. Question: Must an institution under the JLD Program generate a certain amount of student wages?

Answer: Yes. Under the JLD Program, an institution must locate and develop jobs that generate total student wages exceeding the total amount of the Federal funds spent under the JLD Program.

11. Question: May an institution participating in FWS enter into a written agreement with other participating institutions to establish and operate a JLD Program?

Answer: Yes. An institution that is participating in FWS may enter into a written agreement with other FWS participating institutions to establish and to operate a JLD Program for its students. The agreement must designate the administrator of the program and must specify the terms, conditions, and performance standards of the program. Each institution that is part of the agreement retains responsibility for properly disbursing and accounting for the Federal funds it contributes under the agreement. For example, each institution must show that its own students have earned wages that exceed the amount of Federal funds the institution contributed to locate and develop those jobs.

12. Question: What types of organizations should an institution contact to locate and develop jobs through the JLD Program?

Answer: Jobs located or developed under the JLD Program may be for either a profit or nonprofit employer.

13. Question: May the JLD Program be used to locate and develop jobs for FWS students?

Answer: Yes. Federal JLD funds are to be used to pay the institution's costs of establishing and administering the JLD Program under which jobs are located and developed for FWS and non-FWS eligible students. However, using JLD funds to find jobs only for FWS students would not satisfy the statutory requirement to expand off-

campus jobs for currently enrolled students who want jobs, regardless of their financial need.

14. Question: May JLD Program funds be used to locate and develop jobs at the institution or at other eligible institutions?

Answer: No. The institution cannot use JLD funds to locate and develop jobs at the institution or at other eligible institutions. The JLD funds can only be used to locate and develop jobs off-campus.

15. Question: May JLD funds be used to pay students whose jobs were located and developed through the program?

Answer: No. The JLD funds are not to be used to pay students whose jobs were located and developed through the JLD Program.

16. Question: May an institution employ FWS and non-FWS students as staff in the JLD Program?

Answer: Yes. An institution may employ FWS and non-FWS students as staff in the JLD Program. The prohibition against using JLD funds to locate and develop jobs at any institution does not include the hiring of students to work as staff for the JLD Program itself because the JLD staff jobs were not located and developed with JLD Program funds.

17. Question: May the Federal JLD funds be used to pay the non-Federal share of the wages earned by FWS students working as staff in the JLD Program?

Answer: No. The use of any funds allocated under the FWS Program is prohibited from being used to pay the non-Federal share of FWS compensation to its students. However, since JLD allowable costs include staff salaries, the institution with its own funds would pay the non-Federal share of the wages earned by FWS students working as staff in the JLD Program and count those funds in meeting the minimum 20 percent institutional share requirement.

18. Question: May the institution under the JLD Program locate and develop jobs for students to obtain upon graduation?

Answer: No. The program locates and develops off-campus employment opportunities for students during and between periods of attendance. The program may not be used for the placement of students in jobs upon graduation.

19. Question: Does the JLD Program encourage locating and developing jobs for students that provide community services?

Answer: Yes. The statement of purpose for the JLD Program includes the encouragement of participation in community service activities. Further, the JLD Program description notes that funds are to be expended to establish or expand a program to locate and develop jobs, including community service jobs. However, the JLD Program does not have a specific minimum community service requirement as does the FWS Program.

20. Question: Does the JLD Program have a requirement similar to the one for the FWS Program that jobs, to the maximum extent practicable, complement and reinforce the educational programs or vocational goals of the students in question?

Answer: Yes. Under the JLD Program, the jobs located and developed must be suitable to the scheduling and other needs of the students and, to the maximum extent practicable, must complement and reinforce the educational programs or vocational goals of these students.

21. Question: May the jobs located and developed under the JLD Program be full-time?

Answer: Yes. The jobs located and developed under the JLD Program may be either full-time or part-time.

22. Question: May jobs located and developed under the JLD Program result in the displacement of employed workers?

Answer: No. The jobs located and developed under the JLD Program must not displace employees or impair existing service contracts.

APPENDIX 6

State Commissions for National and Community Service

Alabama
Ms. Elaine Wiggins
Alabama Nat'l & Community Service State Commission
Governor's Office
The State House Suite 224
Montgomery, AL 36104
Ph: 334-242-7174 **Fax:** 334-242-2885

Alaska
Ms. Michelle Anderson
Alaska State Community Service Commission
Dept. of Community & Regional Affairs
153rd Street
Juneau, AK 99811
Ph: 907-465-4756 **Fax:** 907-465-2948

Arizona
Ms. Michelle Lyons-Mayer
Arizona National and Community Service Commission
1700 West Washington St., Suite 101C
Phoenix, AZ 85007
Ph: 602-542-3461 **Fax:** 602-542-3520

Arkansas
Ms. Betty Hicks
Arkansas Commission on Nat'l and Community Service
Donaghey Plaza South, 7th & Main, Suite 1300
Little Rock, AR 72201
Ph: 501-682-6717 **Fax:** 501-682-1623
E-mail: arcns@aol.com

California
Dr. Linda Forsyth
Calif. Commission on Improving Life Through Service
1121 L St. Suite 600
Sacramento, CA 95814
Ph: 916-323-7646 **Fax:** 916-323-3227
E-mail: LFORSYTH@CA.OCDE.GOV

Colorado
Mr. Greg Geissler
Colorado State Commission
1313 Sherman, Suite 500
Denver, CO 80203
Ph: 303-866-4900 **Fax:** 303-866-4992

Connecticut
Ms. Sandy Santy
Conn. Commission on Nat'l & Community Service
Dept. of Higher Educaction
61 Woodland St.
Hartford, CT 06105
Ph: 203-566-6154 **Fax:** 203-566-7865
E-mail: wpfellowship@apollo.commnet.edu

Delaware
Mr. Vollie Melson
Delaware Commission on Nat'l & Community Service
Carvel State Office Building - 4th Floor
820 North French Street
Wilmington, DE 19801
Ph: 302-577-6650 **Fax:** 302-577-6828
E-mail: DECNCS@aol.com

District of Columbia
Ms. Yvonne Walker
D.C. Commission on National & Community Service
Office of Policy and Evaluation
441 Fourth Street, NW Suite 920 - South
Washington, DC 20001
Ph: 202-727-6979 **Fax:** 202-727-3765

Florida
Mr. Bill Bentley
Florida Governor's Commission on Community Service
The Bloxham Building, Suite 109
725 South Calhoun Street
Tallahassee, FL 32301
Ph: 904 921-5172 **Fax:** 904-921-5146
E-mail: tabatha-burn-mcmahon@flcomsrvc.win.nat

Georgia
Ms. Lynn Thornton
GA Commission on National and Community Service
2020 Equitable Building
100 Peachtree St.
Atlanta, GA 30303
Ph: 404-657-7827 **Fax:** 404-657-7835
E-mail: gcncs@mindspring.com

Hawaii
Mr. Issac Watson
Hawaii State Commission on Nat'l & Community Service
335 Merchant St.,Rm. 101
Honolulu, HI 96813
Ph: 808-586-8675 **Fax:** 808-586-8685

Idaho
Ms. Kelly Houston
Idaho Commission for Nat'l & Community Service
500 South 10th Street
P.O. Box 83720
Boise, ID 83720-0018
Ph: 208-332-8274 **Fax:** 208-334-3635

Indiana
Mr. Joe Smith
Indiana Commission on Community Service
302 West Washington St., Room E220
Indianapolis, IN 46204
Ph: 317-233-4273 **Fax:** 317-233-5660
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Ms. Patricia Kells
Kansas Commission on National and Community Service
200 SW 6th
PO Box 889
Topeka, KS 66603
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Louisiana
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Louisiana Serve Commission
263 Third Street, Suite 610
Baton Rouge, LA 70802
Ph: 504-342-2038 **Fax:** 504-342-0106

Maryland
Dr. Marilyn W. Smith
Governor's Commission on Service
300 W. Preston St., 6th Floor
State Office Bldg.
Baltimore, MD 21201
Ph: 410-225-1216 **Fax:** 410-333-5957
E-mail: ms247@umail.umd.edu

Michigan
Mr. Frank Dirks
Michigan Community Service Commission
111 South Capitol Ave. -- Olds Plaza Building
4th Floor
Lansing, MI 48909
Ph: 517-335-4295 **Fax:** 517-373-4977

Illinois
Ms. Jeanne Bradner
Illinois Commission on Community Service
Department of Commerce and Community Affairs
100 West Randolf, Suite 3 - 400
Chicago, IL 60601
Ph: 312-814-5940 **Fax:** 312-814-7236

Iowa
Ms. Barbara Finch
Iowa Commission on Community Service
150 East Des Moines St.
Des Moines, IA 50309
Ph: 515-281-9043 **Fax:** 515-281-9033

Kentucky
Mr. Dwen Chester
Kentucky Community Service Commission
State Office Bldg., Room 923
501 High Street
Frankfort, KY 40622
Ph: 502-564-5330 **Fax:** 502-564-7987
E-mail: fwbowen@dotsob.kytrans.kytc.state.ky.us

Maine
Ms. Maryalice Crofton
Maine Commission on Nat'l & Community Service
Maine State Planning Office/State House
184 State Street - Station #38
Augusta, ME 04333
Ph: 207-287-5300 **Fax:** 207-287-6489
E-mail: mccs@state.me.us

Massachusetts
Ms. Kate Mehr
Massachusetts Nat'l & Community Service Commission
87 Summer St., 4th Floor
Boston, MA 02110
Ph: 617-542-2544 **Fax:** 617-542-0240
E-mail: 1021072315@compuserve.com

Minnesota
Ms. Mary Jo Richardson
Minnesota Commission on Nat'l & Community Service
683 Capitol Square Bldg.
Saint Paul, MN 55101
Ph: 612-296-1435 **Fax:** 612-296-3348
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Mississippi
Ms. Marsha Meeks Kelly
Mississippi Commission for Nat'l & Community Service
3825 Ridgewood Rd.
Jackson, MS 39211-6453
Ph: 601-982-6738 **Fax:** 601-982-6790
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Montana
Ms. Mary Blake
Montana Community Services Advisory Council
State Capitol, Room 219
Helena, MT 59620
Ph: 406-444-5547 **Fax:** 406-444-4418
E-mail: cg2077%zip02@mt.gov

Nevada
Ms. Karen LaBat
Nevada Commission for National & Community Service
200 South Third Street
Suite 448
Las Vegas, NV 89155
Ph: 702-486-2730 **Fax:** 702-486-2733

New Jersey
Ms. Rowena Madden
NJ Commission on National & Community Service
c/o NJ Dept of Ed -- Ofc. of Innovative Programs
100 Riverview Plaza, CN 500
Trenton, NJ 08625
Ph: 609-633-9629 **Fax:** 609-633-9825

New York
Ms. Nikki Smith
NY Commission on National & Community Service
State Capitol - Room #254 -- Division of the Budget
Albany, NY 12224
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E-mail:
PROGRAM.AMERICORPS@budget.mailnet.state.NY.US

Ohio
Ms. Kitty Burcsu
Governor's Community Service Commission
51 North High St., Suite 481
Columbus, OH 43215
Ph: 614-728-2916 **Fax:** 614-728-2921
E-mail: 76702.2246@compuserve.com

Missouri
Mr. Curtis Hendricks
Missouri Commission on Community Service
c/o Lt. Governor's Office, Capitol Bldg.
201 W. Capitol Avenue Room B-14B
Jefferson City, MO 65101
Ph: 573-751-0382 **Fax:** 573-751-9612

Nebraska
Mr. Thomas Miller
NE Commission for National & Community Service
State Capitol -- 6th Floor,
P.O. Box 98927
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Ph: 402-471-6225 **Fax:** 402-471-6286
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New Hampshire
Mr. Tim Dupre
New Hampshire Commission on National & Community Service
64 Old Suncook Rd.
Concord, NH 03301
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E-mail: tdupree@MWHITE.MV.COM

New Mexico
Mr. Jack Ortega
New Mexico Commission for Natl & Community Service
Children Youth and Family Dept.
1120 Paseo de Paralta
Santa Fe, NM 87501
Ph: 505-827-8019 **Fax:** 505-827-9978

North Carolina
Ms. Jacquie Kennedy
NC State Commission on National & Community Service
North Carolina Governor's Office of Citizen Affairs
121 West Jones St.
Raleigh, NC 27603
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South Carolina
Ms. Jean Moore
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PennSERVE: The Governor's Office of Citizen Service
Department of Labor and Industry
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